

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

Hon. Robert. B. Kugler

This Document Relates To:
All Actions

Civ. No. 19-2875 (RBK/JS)

**PLAINTIFFS' AMENDED NOTICE OF VIDEOTAPED
DEPOSITION OF SUE PERRY**

TO: **Alexis Brancato**
Kirkland & Ellis, LLP
601 Lexington Avenue
New York, NY 10022

Counsel for Defendants Torrent Pharmaceuticals LTD and Torrent Pharma Inc.

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, Plaintiffs will take the videotaped deposition of Sue Perry. The deposition will commence on **Wednesday June 9, 2021, at 9:00 a.m. Eastern Standard Time**, and continue until completion, at 2917 Michael Ave, Kalamazoo, MI 49004, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632).

The witness shall produce the documents requested at Exhibit A, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

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The deposition will be taken before an officer authorized to administer oaths. Testimony given during the deposition will be recorded by sound video recording and stenographic means.

DATED this 18th day of May, 2021.

BARTON AND BURROWS, LLC

By: /s/ Stacy A. Burrows
Stacy A. Burrows
5201 Johnson Dr., Ste. 110
Mission, KS 66205
Phone (913) 563-6253

Attorneys for Plaintiffs

EXHIBIT A

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Sue Perry.
2. All documents in Sue Perry's possession pertaining to Torrent Pharmaceuticals Limited and Torrent Pharma Inc.'s production, sale, and recall of valsartan, losartan, and irbesartan products and any communications in her possession regarding the same.

CERTIFICATE OF SERVICE

I, Stacy Burrows, hereby certify that on May 18th, 2021, I caused true and correct copies of the foregoing to be transmitted via ECF to all counsel having registered an appearance on ECF, with courtesy copies served on counsel for Torrent Pharmaceuticals Limited and Torrent Pharma Inc., and Defendants' liaison counsel, via email.

DATED this 18th day of May, 2021.

BARTON AND BURROWS, LLC

By: /s/ Stacy A. Burrows
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Attorneys for Plaintiffs